



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

AUG 01 2016

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6126 5032

Mr. Vern Smyth
Process Control Manager
Dubuque Stamping and Manufacturing
PO Box 798
Dubuque, Iowa 52004-0798

RE: Dubuque Stamping and Manufacturing
Dubuque, Iowa
RCRA ID No.: IAD005269675

Dear Mr. Smyth:

Letter of Warning/Request for Information

On March 24, 2015, a representative of the U. S. Environmental Protection Agency inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act.

My staff has reviewed the inspection report, and your March 27, 2015 response to the Notice of Preliminary Findings and have determined that violations of RCRA were documented. Based on the information reviewed, each of the three violations cited during the 2015 inspection have been corrected.

We are requesting additional information regarding your facility's compliance status. Enclosed is a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



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Within 30 calendar days of receiving this letter, please mail your response to: Rebecca Wenner, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas, 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Rebecca Wenner, of my staff, at (913) 551-7644.

Sincerely, JUA

A handwritten signature in black ink, appearing to read "Mary Goetz", with a stylized flourish at the end.

Mary Goetz

Chief

Waste Enforcement and Materials Management Branch
Air and Waste Management Division

Enclosures (2)

cc: Amie Davidson, Supervisor, Contaminated Sites Section
Iowa Department of Natural Resources

List of Violations
Dubuque Stamping and Manufacturing
Dubuque, Iowa
RCRA ID No.: IAD005269675

March 24, 2015 Inspection:

1. 40 CFR 279.22(c)(1) – Failure to properly label a used oil storage container.
2. 40 CFR 262.36(d)(4) and 40 CFR 262.34(a)(3) – Failure to mark a hazardous waste storage container with the words “Hazardous Waste”.
3. 40 CFR 262.34(d)(5)(ii) – Failure to post emergency preparedness information next to a telephone.

You were previously inspected by representatives of the EPA on June 22, 2011, during which inspection five violations of RCRA were documented. Two of the violations cited in 2011 were repeated during the 2015 inspection as follows:

- 1) 40 CFR 279.22(c)(1) - Failure to label used oil containers with the words “used oil”.
- 2) 40 CFR 262.34(d)(5)(ii) – Failure to post emergency preparedness information next to a telephone, including: the name and telephone number of the emergency coordinator; the location of fire extinguishers and spill control material, and if present, fire alarm; and the telephone number of the fire department unless the facility has a direct alarm.

Requested Information
Dubuque Stamping and Manufacturing
Dubuque, Iowa
RCRA ID No. IAD005269675

1. Please provide a description of what procedural changes you have made since the 2015 inspection, to ensure that you continue to comply with 40 CFR 279.22(c)(1), and ensure that all containers of used oil are properly labeled "used oil". Please include supporting documentation, including copies of documents and/or photographs to illustrate these changes.
2. Please provide a description of what procedural changes you have made since the 2015 inspection, to ensure that you continue to comply with 40 CFR 262.34(d)(5)(ii), and that all required emergency information is posted next to a telephone. Please include supporting documentation, including copies of documents and/or legible photographs to illustrate these changes.

3007 RESPONSE INSTRUCTIONS

- * Identify the Person(s) responding to this request on your behalf.
- * Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- * For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- * For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- * For each numbered item, identify all persons consulted in the preparation of the answer.
- * For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- * If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- * If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- * If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- * You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- * The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- * A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- * Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.
- * This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- * The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

